

United States District Court

Western District Pennsylvania

DERRICK RANKINE

C.A # 04-100 ERIC

VS

Superintendent Folino et al.

Pretrial State of Plaintiff

'07 JAN 18 AM 1:16

CLERK
U.S. DISTRICT COURT

- (1) Plaintiff was transferred to SCI-GREEN on January 20, 2004, From SCI-Somerset, after Plaintiff spent 85 days in Administrative Custody misconduct FREE at SCI-Somerset.
- (2) Plaintiff was remanded into the RHU by the defendants in retaliation for filing a Law Suit and pursuing these Law Suits against SCI-Albion and SCI-Somerset.
- (3) Plaintiff was denied all clothing with the exception of a jumpsuit and FREEZED day and day by the defendants in retaliation for pursuing the above Law Suits.
- (4) The defendant then gave Plaintiff contaminated meals, denied Plaintiff water and meals for extended period of time; ASSAULTED the Plaintiff without provocation or justification, terrorized the Plaintiff day and night in retaliation for pursuing the above Law Suits.

(5) The defendants then denied Plaintiff access to the Law Library and to the yard for extended period of time, in retaliation for pursuing the above civil action:

(6) The defendants then denied Plaintiff proper medical care, medical care, and ignored Plaintiff's request for medical care and prevented medical staff from giving medical treatment to Plaintiff, in retaliation for pursuing the above civil actions; in violations of the laws of the United States and Commonwealth of Pennsylvania.

(7) PLEASE NOTE: The defendants have confiscated all of Plaintiff's legal material and all evidence for this case, the case against SCI-Somerset and SCI-Albion and Plaintiff's criminal case from June 21, 2004 and February 11, 2005 and have refused to return them to Plaintiff in violations of the laws of the United States and Commonwealth of Pennsylvania. Plaintiff is therefore unable to be more specific in this statement at this time.

(8) Plaintiff is also unable to provide witnesses names at this time or any exhibits at this

time to the Court

Plaintiff would like Mr. Chris MEYERS, SCI-FAYETTE, P.O. Box 9999, Labelle PA 15450 to be subpoenaed as a witness. Mr MEYERS will testify about Plaintiff's medical condition upon arrival at SCI-FAYETTE on May 4, 2005.

Respectfully Submitted
Derrick Rankine

EU 5850

SCI-FAYETTE

P.O. Box 9999

Labelle PA 15450

01/15/07.

UNITED STATES District Court

Western District PENNSYLVANIA

DERRICK RANKINE C.A.#CH-KC ERIE

VS.
SUPERINTENDENT FOLINO ET AL.

PROOF OF SERVICE and VERIFICATION.

PLAINTIFF SWEARS under oath and the PENALTY
OF PERJURY pursuant to 28 U.S.C. A § 1746
that all statement made in the within
pre-trial motion and memorandum of law
for a default judgment are true and that
a copy of the within motions are made
mailed to Mr. KEMAL MERKLI, OFFICE OF
ATTORNEY GENERAL, 564 FORBES AVE, PITTS-
BURGH PA 15219. to ^{the} JANUARY 15, 2007.

Respectfully Submitted
Derrick Rankine

EU 5850

SCI- FAYETTE

P.O. BOX 9999

LABELLE PA 15450

01/15/07.